

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**YIEN-KOO KING,**

**Plaintiff,**

**-against-**

**ANDREW WANG, SHOU-KUNG WANG, BAO WU  
TANG, JIAN BAO GALLERY, ANTHONY CHOU,  
CHEN-MEI LIN, WEI ZHENG, YE YONG-QING, YUE  
DA-JIN and JOHN DOES 1-9,**

**Defendants.**

**1:14-Civ-07694-(LJL) (JLC)**

**NOTICE OF PLAINTIFF'S OMNIBUS MOTIONS  
IN LIMINE**

**PLEASE TAKE NOTICE**, that plaintiff Yien-Koo Wang King (the "Plaintiff"), by and through her undersigned counsel, shall move this Court, before the Honorable Lewis J. Liman, at a date and time to be set by the Court, at the United States Courthouse located at 500 Pearl Street, Courtroom 15C, New York, New York, upon the accompanying Omnibus Memorandum of Law in Support of Motions in Limine, dated April 9, 2021, and the Declaration of Timothy Savitsky in Support of Motion, dated April 9, 2021, and the exhibits thereto, and upon all prior pleadings and proceedings herein, for an order pursuant to Fed. R. Evid. Rules 401, 402, 403, 801(d), 803(17), 803(18), and 807 and Fed. R. Civ. P. Rule 26(a)(2)(c). The motions seek: (1) to apply the doctrine of collateral estoppel to certain issues previously determined in the New York County Surrogate's Court and Supreme Court; (2) to preclude evidence of purported misconduct by Plaintiff and/or her husband from trial; (3) to determine that certain art records and photographs are not

barred by the rule against hearsay and are admissible; (4) to preclude certain opinions of a non-retained expert; and (5) for such other and further relief as the Court deems just.

Dated: New York, New York  
April 9, 2021

By: /s/Timothy Savitsky  
**SAM P. ISRAEL, P.C.**  
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Timothy Savitsky (TS6683)  
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*Counsel for Plaintiff Yien-Koo King*

**To:** All parties of record via ECF